

2012 AUG - 2 PM 10:55

Colorado Springs, CO 80906  
July 31, 2012

OFFICE

Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

**SENSITIVE**

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT  
2012 AUG - 7 AM 9:34

VIA: Federal Express

MUR #

662

RE: Complaint of suspicious campaign finance activities

Dear Sir or Madam:

My husband and I are members of the Broadmoor Golf Club (the "Club") in Colorado Springs, Colorado. The facilities of this private club, to which we paid an initiation fee and continue to pay monthly dues, are located on the property of the Broadmoor Hotel (the "Hotel") in Colorado, Springs, Colorado.

On or about August 13, 2010, we received a solicitation to attend a fundraising dinner and reception on behalf of the American Hotel & Lodging Association (the "AH&LA") Political Action Committee, (a/k/a "HotelPAC") for the price of \$50.00 per person. Upon payment, we would have the opportunity to bid on auction travel destination offerings from a number of donors (Exhibits 1 and 1(a)).

I completed and sent the provided "Membership Application" (Exhibit 2) to the proper address and paid with my personal American Express card which was charged to my account on September 27, 2010, (Exhibit 3).

On or about August 3, 2011, I received a packet of documents that included a similar solicitation to attend a HotelPAC fundraising event which also was sent to all Club members and offered the opportunity to bid on travel packages from certain donors (Exhibit 4). This packet also included a "Membership Application" (Exhibit 5) and a letter above the name of Joseph A. McInerney CHA, the President and CEO of AH&LA, offering "alternative membership opportunities" (Exhibit 6). Additionally, this packet included a supplementary e-mail which required, this time, only a \$25.00 per couple charge to participate in this fundraising event (Exhibit 7).

During the subject years, I have received numerous unsolicited and complimentary copies of *Lodging* magazine, which, according to its masthead, is "The Official Magazine of the American Hotel & Lodging Association". As examples of the contents of the magazine relative to solicitations for HotelPAC, I have enclosed Exhibits 8 and 9, dated February 2012, and March 2012, respectively, which may constitute direct inappropriate solicitations for contributions to HotelPAC, both above the signature of the aforementioned President and CEO of AH&LA, Joseph A. McInerney.

On or about July 28, 2012, yet another solicitation was sent to my home to participate in the upcoming August 30, 2012, this time offering a complimentary dinner and reception to a

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fundraising event for HotelPAC, including a list of donors of travel packages which will be up for bid (Exhibit 10).

I firmly believe that this collaborative planned decline in contribution levels to attend HotelPAC fundraising events on the property of the Hotel is a conspiracy meant to illicitly lure individuals who have no nexus to AH&LA to attend such events and bid on travel packages solely to add to the political coffers of HotelPAC and its apparently whimsical political contributions pattern. I further believe that the donors of said packages may have no idea that they are participating in such a seemingly nefarious enterprise and, when alerted by me, may no longer donate.

I am active in politics on the local, state, and national levels. After reviewing the candidates supported by HotelPAC, there are many listed to whose campaigns I would never contribute a dime. I feel that I and my fellow Club members have been duped by the slick scheme I have outlined herein and may have somehow, innocently, underwritten these fundraisers by merely paying our monthly Club dues.

As an American citizen who strongly believes in free and fair elections, I believe that I should be free from any further unwanted, inappropriate and, perhaps, illegal solicitations from AH&LA. I am not a member of the executive or administrative staff of the Hotel or connected to the hotel industry in any way and, as such, believe I never should be solicited by HotelPAC. Additionally, I have never separately and specifically given permission for my corporation to receive such solicitations and suspect that many recipients of *Lodging* magazine have not given such permissions or that such solicitations should be made as frequently as they have been without same. Given the seemingly reckless criteria for HotelPAC solicitations, I could be a foreign national and would still have been solicited and had my donation accepted as part of this ongoing sham operation!

I respectfully request that the Federal Election Commission fully investigate and put a stop to these, at best, dubious practices immediately, enjoin the parties involved from proceeding with the next scheduled fundraiser on August 30, 2012, fine and sanction the AH&LA and all individuals, including, but not limited to, the President and CEO, Joseph A. McNery, and the CFO of AH&LA, Joori Jeon, (apparently for signing false documents submitted to the Federal Election Commission) and prosecute those involved in this continuing conspiracy to the fullest extent of the law.

Also, please be advised that I intend to send copies of this now-public document, with attachments, to Mr. Phillip F. Anschutz, new owner of the Hotel, our contacts at *The New York Times*, *The Washington Post*, *The Denver Post*, *The Gazette*, *The Hill*, and *Roll Call*,

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and various congressional offices, including the Speaker of the House, Hon. John A. Boehner, a family friend for over twenty years.

Respectfully submitted,

*Genevieve S. Wallace*  
Genevieve S. Wallace

Colorado Springs, Colorado 80906

*Signed and sworn to before me*

The foregoing instrument was acknowledged on 7/31/12

by Genevieve S. Wallace

STATE OF COLORADO

COUNTY OF EL PASO SS

NOTARY

MY COMMISSION EXPIRES 06-01-2014

LUKE SMITH  
NOTARY PUBLIC  
STATE OF COLORADO

My Commission Expires 06-01-2014

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## THE BROADMOOR

August 13, 2010

Jack Connors

Colorado Springs, CO 80906

Dear Jack,

Each year The BRO^DMOOR hosts a fundraising event on behalf of the American Hotel & Lodging Association Political Action Committee, whereby people in our industry and suppliers get together for a golf event and a dinner at Cheyenne Lodge with the highlight being a live and silent auction with some incredible travel destination offerings going at super great values. This year we would like to do something a little different and open it up to those members who would like to attend and enjoy a nice reception and a great dinner at Cheyenne Lodge but, most of all, to have an opportunity to bid on some of these unique travel packages and enjoy some terrific deals. Here are some examples to give you some flavor:

- The Naples Beach Hotel & Golf Club
- Fairmont Southampton in Bermuda
- Hyatt Regency Lost Pines Resort and Spa in Austin, Texas
- Two nights in an ocean view suite at the spectacular new Terranea Resort in southern California
- The Westin-Kierland Resort and Spa, Arizona
- The Breakers in Palm Beach
- La Jolla Beach and Tennis Club
- The Ritz-Carlton, Naples, Florida
- Pebble Beach Resort
- The Ocean Reef Club, Key Largo
- The Ponte Vedra Inn
- The Inn on Biltmore Estate
- The Montage, Laguna Beach

In all there are over 100 travel packages that will be auctioned. The cost is \$50 per person, which includes the reception and dinner. Please complete the attached registration form and return to Kelly Eide in The BRO^DMOOR Golf Club by Monday, August 30<sup>th</sup>. The charge for dinner and any auction items that you may choose to purchase can be charged to your personal major credit card.

Thank you and we hope to see you there.

*Sherry L. Clark*  
Sherry Clark  
Golf Club Manager  
The BRO^DMOOR

*Stephen Bartolin, Jr.*  
Stephen Bartolin, Jr.  
President and CEO  
The BRO^DMOOR

Enclosure

POST OFFICE BOX 1439  
COLORADO SPRINGS, COLORADO 80901

Exhibit 1

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2010 HotelpAC BRO<sup>A</sup>DMOOR Classic

Wednesday, September 1, 2010

5:30pm

Cheyenne Mountain Lodge

Exhibit 1 (2)



1201 New York Avenue, NW, #600 • Washington, DC 20005-3931  
Tel: 202-289-3100 • Fax: 202-289-3199 • www.ahla.com

Exhibit 2

### **MEMBERSHIP APPLICATION**

Please complete the application and return with \$25.00 for your 12-Month Membership in the American Hotel & Lodging Association. (September – August, 2012)

**Contact Name and Title**

**Company Name**

**Address**

**City, State, Zip**

**Country**

**Telephone**

**Fax**

**Email Address** (Your email address will help us deliver important member news and benefits. AH&LA will never sell or share your email address.)

**Company Website**

Please check the membership segment that best meets your description.

- |   |   |
|---|---|
| <input type="checkbox"/> Sole Practitioner        | <input type="checkbox"/> Retired Hotelier       |
| <input type="checkbox"/> Allied (Vendor/Supplier) | <input type="checkbox"/> WIL (Women in Lodging) |
| <input type="checkbox"/> University/Faculty       | <input type="checkbox"/> Other                  |

**Payment Information:**

- ☐ VISA                      ☐ American Express                      ☐ MasterCard

**Credit Card #** \_\_\_\_\_ **Expiration Date** \_\_\_\_\_

**Name on Card** \_\_\_\_\_ **Security Code** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

For more information please contact Anne-Wesley Teague at AH&LA:

Telephone: (202) 289-3125

Email: [awteague@ahla.com](mailto:awteague@ahla.com)

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Exhibit 4

August 3, 2011

Each year The BRO<sup>^</sup>DMOOR hosts a fundraising event on behalf of the American Hotel & Lodging Association Political Action Committee, whereby people in our industry and suppliers get together for a golf event and a dinner at Cheyenne Lodge with the highlight being a live and silent auction with some incredible travel destination offerings going at super great values. This year again, we would like to invite you as Broadmoor Golf Club members to attend and enjoy a nice reception and a great dinner at Cheyenne Lodge (complimentary) but, most of all, to have an opportunity to bid on some of these unique travel packages and enjoy some terrific deals. This event is Monday, August 8<sup>th</sup> at 5:00 p.m. at Cheyenne Lodge. Here are some examples to give you some flavor:

- Montage Laguna Beach
- Fairmont Southampton in Bermuda
- The Hotel Hershey
- Two nights in an ocean view suite at the spectacular new Terranea Resort in southern California
- The Westin-Kierland Resort and Spa, Arizona
- The Breakers in Palm Beach
- La Jolla Ranch and Tennis Club
- Ponte Vedra Inn & Club
- The Ocean Reef Club, Key Largo
- The Atlantis in the Bahamas
- Las Vegas Professional Bull Riders World Finals Package
- The Grove Park Inn

In all there are over 150 amazing travel packages that will be auctioned. The cost is complimentary, which includes the reception and dinner which starts at 5:00 p.m. at Cheyenne Lodge. Please call Shannon Cordovano at 577-5898 as soon as possible and by 12 noon on Monday, August 8<sup>th</sup> at the latest. We apologize for the short notice and hope that you can make plans to attend!! Any auction items that you may choose to purchase can be charged to your personal major credit card.

Thank you and we hope to see you there.

*Sherry L. Clark*  
Sherry Clark  
Golf Club Manager  
The BRO<sup>^</sup>DMOOR

*Stephen Bartolin, Jr.*  
Stephen Bartolin, Jr.  
President and CEO  
The BRO<sup>^</sup>DMOOR

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1201 New York Avenue, NW, #600 • Washington, DC 20005-3931  
Tel: 202-289-3100 • Fax: 202-289-3199 • www.ahla.com

Exhibit 5

### **MEMBERSHIP APPLICATION**

Please complete the application and return with \$25.00 for your 12-Month Membership in the American Hotel & Lodging Association. (September – August, 2012)

\_\_\_\_\_  
**Contact Name and Title**

\_\_\_\_\_  
**Company Name**

\_\_\_\_\_  
**Address**

\_\_\_\_\_  
**City, State, Zip**

\_\_\_\_\_  
**Country**

\_\_\_\_\_  
**Telephone**

\_\_\_\_\_  
**Fax**

\_\_\_\_\_  
**Email Address** (Your email address will help us deliver important member news and benefits. AH&LA will never sell or share your email address.)

\_\_\_\_\_  
**Company Website**

Please check the membership segment that best meets your description.

- |  |  |
|--|--|
| <input type="checkbox"/> <b>Scm Practitioner</b>         | <input type="checkbox"/> <b>Retired Hotelier</b>       |
| <input type="checkbox"/> <b>Allied (Vendor/Supplier)</b> | <input type="checkbox"/> <b>WIL (Women in Lodging)</b> |
| <input type="checkbox"/> <b>University/Faculty</b>       | <input type="checkbox"/> <b>Other</b>                  |

**Payment Information:**

☐ **VISA**

☐ **American Express**

☐ **MasterCard**

**Credit Card #** \_\_\_\_\_ **Expiration Date** \_\_\_\_\_

**Name on Card** \_\_\_\_\_ **Security Code** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

For more information please contact Anne-Wesley Teague at AH&LA:

**Telephone:** (202) 289-3125

**Email:** awteague@ahla.com



Subject: AH&LA - American Hotel & Lodging Association Opportunity for Members

From: SCLARK@broadmoor.com (SCLARK@broadmoor.com)

To:

Date: Wednesday, August 3, 2011 10:37 AM

Exhibit 6

Dear Member,

Below is an invitation to join the American Hotel & Lodging Assn (AH&LA) for a minimal cost. This will give you the ability to attend special events sponsored by AH & LA. If you are interested, please complete the attached application and fax to Shannon Cordovana, 719.577.5741 at your earliest convenience. If you have any questions, do not hesitate to contact me, [sclark@broadmoor.com](mailto:sclark@broadmoor.com).

Sher



**HOTEL POLITICAL ACTION COMMITTEE**

1201 New York Avenue, NW • #800 • Washington, DC 20005

Tel. 202-288-3120 • Fax 202-288-3185 • [www.ahla.com](http://www.ahla.com)

Dear Potential Member,

Recently, the American Hotel & Lodging Association (AH&LA) has instituted a program to offer alternate membership opportunities to friends of our industry. The AH&LA is the sole national organization in the United States, representing all sectors and stakeholders in the lodging industry.

Although this is a discounted program, you will receive the current full membership benefits and rights available to all members. It provides you with the opportunity to attend conferences and events at discounted admission prices or complementary registration at some events like the AH&LA Fall Conference in New York City which is held in conjunction with the International Hotel/Motel & Restaurant Show; attend our Legislative Action Summit, obtain discounted material from our Educational Institute, and participate in other networking events. To learn more about all our benefits, go to our website [www.ahla.com](http://www.ahla.com).

Hopefully, you will accept this special offer and join the AH&LA. For your information, attached is a membership application. If you need any additional information, please contact Sandi Goad, director of membership at 202-289-3142 or [sgoad@ahla.com](mailto:sgoad@ahla.com). I look forward to seeing you at an AH&LA event.

Sincerely,

Joseph A. McInerney CHA

*Sherry L. Clark*  
Broadmoor Golf Club  
P.O. Box 1439

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Subject: An Invitation for a Fabulous Evening  
 From: SCLARK@broadmoor.com (SCLARK@broadmoor.com)  
 To:  
 Cc: SCLARK@broadmoor.com;  
 Date: Wednesday, August 3, 2011 2:33 PM

Exhibit 7

We would like to invite you to attend a wonderful evening on Monday, August 8, that includes a reception, dinner, and auction. We realize that this is a last minute invitation but, due to complications with regulations, we were unable to issue this invite to our membership until a solution was reached. The reception and dinner are complimentary, but attendees must be members of the American Hotel & Lodging Association (this will explain the previous email regarding AH&LA). A limited number of reservations are available.

You must join AH&LA for \$25 per couple and RSVP your attendance as stated in the attached invite. You may drive to Cheyenne Lodge or shuttles will depart the South Hotel commencing at 4:30 pm on Monday. Attire is resort casual or golf attire. Many of you attended in 2010 and we hope you are able to join us again this year. This year, there will be reserved tables in the front for Golf Club members. If you have any questions, please feel free to contact me.  
 Sher

*Sherry L. Clark*  
 Broadmoor Golf Club  
 P.O. Box 1439  
 Colorado Springs, CO 80901  
 Phone: 303.920.4206  
 Fax: 303.920.8206  
 Club VM: 719.577.5845  
[sclark@broadmoor.com](mailto:sclark@broadmoor.com)  
[www.broadmoorgolfclub.org](http://www.broadmoorgolfclub.org)

*Home of the 2011 U.S. Women's Open Championship*  
 July 4-10, 2011

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# AH&LA

12/12 edition of Lodging magazine

Exhibit 8

INSIDE 20 | GOVERNMENTAL AFFAIRS • Need a Lift?

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## From the President's Desk...

The AH&LA Strategic Planning Committee met last month to discuss the recent AH&LA governance recommendations and start hammering out a real-world model. The committee members are working diligently to provide vital input as they look

at various scenarios to ensure AH&LA best represents the lodging industry. There is a lot of work to be done between now and the June board of directors meeting where a final recommendation will be presented.

Our Legislative Action Summit is later this month (Feb. 29-March 1) in Washington, D.C. It is a presidential election year, so we're fortunate to be one of the first groups to address Congress before the focus becomes all election, all the time. It is imperative that the lodging industry travels to Washington in full force, since between travel issues, labor concerns, and tax uncertainty, we cannot afford to wait until next year. While it is difficult to take time out of our busy schedules, LAS is a unique opportunity to have an impact when it is needed most—now. Join AH&LA and your fellow hoteliers on Capitol Hill to make this year a success for your lodging industry. Visit [www.ahla.com/LAS](http://www.ahla.com/LAS) for more information and to register.

While we're on the topic of politics, I urge you to contribute to HotelPAC, which now has a new online option via [www.ahla.com](http://www.ahla.com). Not only is it a presidential election year, there are also more than 32 Senate seats up for grabs, so it's imperative that representatives who recognize and support our business are elected or re-elected.

I look forward to seeing you in Washington on Feb. 29 for LAS.

## MEMBER BENEFIT PROFILE

### ADA compliance deadline is looming.

by NETANYA STUTZ

**M**arch 15, 2012 is the ADA compliance deadline. That means next month your property needs to ensure guestrooms, the pool, the front desk, and other public spaces are in accordance with the new regulations, and that your employees are trained on service animals, when to release accessible rooms, and more.

And IIR has new rules to follow as well regarding accommodating employees with real or perceived disabilities.

Hopefully, you're well on your way toward compliance. But to assist you with fine tuning of new policies and procedures, check out the wealth of resources available in the AH&LA members-only website:

**ADA Quick Guide to Compliance**—this chart makes it easy to understand the differences between the 1991 regulations and the 2010 regulations.

**New ADA Regulations for Pools and Spas Defined**—get detailed information on how to get your pool and spa in compliance.

**3-Part Webinar Series**—these previously recorded, live sessions cover topics from employee relations to service animals to property requirements led by subject matter experts.

Members also receive an average of 20 percent savings on ADA training material from the Educational Institute—visit [www.ahlei.org](http://www.ahlei.org) for details. Additionally, AH&LA members can have their personal questions answered by AH&LA Senior Vice President of Governmental Affairs Kevin Maher at [kmaher@ahla.com](mailto:kmaher@ahla.com).

\* Think you already know it all? Take our ADA quiz at [www.ahla.com/knowledge](http://www.ahla.com/knowledge).

# AH&LA

3 1/2 edition of Lodging magazine

Exhibit 9

INSIDE 22 | GOVERNMENTAL AFFAIRS • President Obama Checks in on Hotels



## From the President's Desk...

We've just come back from a most successful AH&LA Legislative Conference. We were fortunate in that our members were one of the first groups to meet with this year's Congress. Hoteliers from across the country educated their representatives on our

industry's most pressing issues, including travel and tourism, labor, and tax issues. Our HotelPAC was also front and center. If you have not already, I urge you to contribute to HotelPAC, which has an online option via [www.ahla.com](http://www.ahla.com). Not only is it a presidential election year, there are also more than 32 Senate seats up for grabs.

This month, Brand USA unveils its first ads to be used in countries around the world, as it launches a concerted marketing program to increase the number of international travelers to the U.S. The ads showcase attractions from all across the United States, including those off the beaten path, to appeal to first-time and repeat visitors. At least half the program's budget is funded by investments from the private sector, including many hotel companies. The goal is to bring millions of new international visitors to the United States, creating tens of thousands of new American jobs.

We've been communicating the new ADA regulations to members for months, but March 15 is the official compliance deadline. The new regulations apply to swimming pools, golf courses, and virtually every other public space. They also apply to all public accommodations regardless of age of construction or renovation. Many onerous provisions were removed, ultimately lessening the burden and financial loss for hoteliers.

March is Women's Month and WIL Connect is hosting a state chapter competition. Visit the AH&LA Website for details on how to join your state chapter or start one!

*Joe A. Burton*

## MEMBER BENEFIT PROFILE

### Free Webinar series for AH&LA members.

by NETANYA STUTZ

In partnership with the Hospitality Financial and Technology Professionals (HFTP), AH&LA is now offering members a series of short technology and e-business Webinars based on AH&LA's Technology Primer documents. Consisting of 12 sessions, the program continues through October 2012, and each Webinar offers live audio, interaction, and is free to HFTP and AH&LA members. By participating, you will gain cutting edge technology insight and best practices to better serve your guests and ensure your property is compliant with new standards.

Take a look at what's coming up next:

**Hotel Technology Infrastructure**  
March 1, 10:30 a.m. (EST)

**Revenue Management**  
April 5, 10:30 a.m. (EST)

**Food & Beverage Systems**  
May 17, 2 p.m. (EST)

To register for any of these free Webinars, and for more information, visit AH&LA's Webinar Archive in the Business Services section of the members only site on [www.ahla.com](http://www.ahla.com). You can access past Webinars from that section as well. For more technology resources, including the Technology Primer series, visit [www.ahla.com/technology](http://www.ahla.com/technology).

If you're already a technology buff and would be interested in joining AH&LA's Technology & eBusiness Committee and help shape future industry initiatives, contact Phyllis Burton at [pburton@ahla.com](mailto:pburton@ahla.com) or (800) 349-0923.

Exh. 6-7, 10

Date: Saturday, July 28, 2012 3:00 PM

Dear Members,

Each year The BRO<sup>A</sup>DMOOR hosts a fundraising event on behalf of the American Hotel & Lodging Association Political Action Committee, whereby people in our industry and suppliers get together for a golf event and a dinner at Cheyenne Lodge with the highlight being a live and silent auction with some incredible travel destination offerings going at super great values. This year again, we would like to invite you, as Broadmoor Golf Club members, to attend and enjoy a nice reception and a great dinner at Cheyenne Lodge (complimentary) but, most of all, to have an opportunity to bid on some of these unique travel packages and enjoy some terrific deals. This event is Thursday, August 30 at 5:00 p.m. at Cheyenne Lodge. Here are some examples of the auction items from 2011 and we expect to have the same caliber items this year.

- Montage Laguna Beach
- Fairmont Southampton in Bermuda
- The Hotel Hershey
- Two nights in an ocean view suite at the spectacular new Terranea Resort in southern California
- The Watson-Kierland Resort and Spa, Arizona
- The Breakers in Palm Beach
- La Jolla Beach and Tennis Club
- Ponte Vedra Inn & Club
- The Ocean Reef Club, Key Largo
- The Atlantis in the Bahamas
- Las Vegas Professional Bull Riders World Finals Package
- The Grove Park Inn

In all, there are over 150 amazing travel packages that will be auctioned. The cost is complimentary, which includes the reception and dinner starting at 5:00 p.m. at Cheyenne Lodge. You must make reservations by contacting Sherry Clark, or 303.920.4206, no later than August 8. She will provide you with some additional information upon receiving your reservation. Seating is limited.

Thank you and we hope to see you there.

Sherry L. Clark

Sherry L. Clark  
Golf Club Manager  
The BRO<sup>A</sup>DMOOR

Stephen Bartolin, Jr.

Stephen Bartolin, Jr.  
President and CEO  
The BRO<sup>A</sup>DMOOR

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